Anusa Salem

_____ FILED _____ ENTERED
_____ LOGGED _____ RECEIVED

MAY 5 2014

AT GREENBELT
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY _____ DEPUTY

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

IN THE MATTER OF THE SEARCH OF)
2010 Toyota Corolla,) Misc. No. 14-1017 JKS
VIN 2T1BU4EE3AC531273)

SCANNED

AFFIDAVIT IN SUPPORT OF APPLICATION FOR SEARCH WARRANT

I, Joseph Sopata, Detective with the Metropolitan Police Department, and task force officer with the Federal Bureau of Investigation, Washington, D.C. Field Office, Washington, D.C., (hereinafter the "affiant") being duly sworn, depose and state as follows:

1. I am a duly appointed Task Force Member of the Federal Bureau of Investigation (FBI), Safe Streets/Cross Border Task Force ("SSCBTF"). I have been detailed to the FBI since 1994. Prior to my involvement with the Safe Streets/Cross Border Task Force, from 1994 until 2007, I was assigned to the Safe Streets Task Force which investigated violent crimes and drug trafficking organizations. I am currently assigned to a squad which investigates Cross Border Narcotic Trafficking from a satellite office (located in Cheverly, Maryland) of the Washington, D.C. Field Office of the FBI. I have been assigned to this squad since October 2009. Between my association with the FBI and my employment with the MPD, I have investigated narcotics cases for over 20 years. I have gained knowledge in the use of various investigative techniques including the utilization of physical surveillance, undercover agents, confidential informants and cooperating witnesses, the controlled purchases of illegal narcotics, consensually monitored recordings, investigative interviews, trash covers, financial investigations, the service of administrative and grand jury subpoenas, analysis of telephone pen register and caller identification system data, conducting court-authorized electronic surveillance and the execution of search and arrest warrants. In the course of my training and experience, I have become familiar with the methods and techniques associated with the distribution of narcotics, the

laundering of drug proceeds, and the organization of drug trafficking groups. Through my training and experience, I am familiar with the actions, habits, traits, methods, and terminology utilized by the traffickers and abusers of controlled dangerous substances.

2. This affidavit is based, in part, upon information provided to me by other Special Agents of the FBI and other Safe Street Task Force members, controlled purchases of illegal drugs, physical surveillance, court-authorized interceptions of cellular telephones and other information gathered during the course of this investigation.

3. Based on your affiant's training, experience and participation in narcotic and drug related investigations, your affiant knows that:

a. Individuals who deal in illegal controlled substances maintain shipping records and materials, books, records, receipts, notes, ledgers, bank records, money orders and other papers relating to the importation, manufacture, transportation, ordering, sale and distribution of illegal controlled substances. These books, records, receipts, notes, ledgers, bank records, money orders, etc., are maintained where the dealers in illegal controlled substances have ready access to them, such as in secured locations within their cars, residences, the residences of friends, family members, and associates, or in the places of operation of the drug distribution activity, such as a stash house or safe house. Moreover, it is common that such records are maintained by traffickers on computers, cellular telephones, laptop computers and other personal electronic devices. In an effort to keep such incriminating materials more secure when stored on such electronic devices, traffickers will store those materials anywhere in the memory of the device without regard for the actual label on or intended purpose for the folder or area of the device.

b. Individuals who deal in illegal controlled substances routinely conceal in their cars, residences or the residences of friends, family members, and associates, or in the places of operation of the drug distribution activity, such as a stash house or safe house, large quantities of currency, financial instruments, precious metals, jewelry and other items of value, typically proceeds of illegal controlled substance transactions.

c. It is common for individuals who deal in the sale and distribution of illegal controlled substances, particularly heroin, to secrete additional narcotics and contraband related to the activity, such as scales, razors, packaging materials, baggies, cutting agents, cooking utensils, microwave ovens, pots, dishes and other containers for mixing, cutting and packaging heroin, in their cars, their residences, or the residences of friends, family members, or associates, or in the places of operation of the drug distribution activity, such as a stash house or safe house.

d. Individuals who deal in the sale and distribution of controlled substances commonly maintain addresses and telephone number books or papers which reflect names, addresses and/or telephone numbers for their associates in their illegal organization. These individuals often utilize cellular telephones, pagers and telephone systems to maintain contact with their associates in their illegal businesses. These telephone records, bills and pager numbers are often found in their cars, places of residence, or the residence of friends, family members, or associates, or in the places of operation of the drug distribution activity, such as a stash house or safe house.

e. Persons who traffic controlled substances maintain photographs documents, letters and records relating to illegal activity for long periods of time. This documentary evidence is usually secreted in their cars, residences, or the residences of friends, family members, or associates, or in the places of operation of the drug distribution activity, such as a stash house or safe house. This documentary evidence includes but is not limited to telephone numbers, telephone books, address books, credit card and hotel receipts, plane and bus tickets and receipts, car rental receipts, accounts and records in fictitious names, false identification, money orders, cashiers checks relating to cash transactions and records indicating the existence of storage facilities used in narcotics trafficking.

f. Individuals who deal in illegal controlled substances frequently use cellular telephones to further their illegal activities by, among other things, remaining in constant or ready communication with one another without restricting either party to a particular location at which they might be subject to physical surveillance by law enforcement authorities and because they believe that interception of cellular communications is more difficult. It is common for these individuals to change phones frequently to avoid detection and to not register the phones in their own names. These individuals keep information on their telephones that includes names, addresses, and phone numbers of their associates in their illegal business. Additionally, individuals often keep paperwork pertaining to the purchase or service of these telephones.

ITEMS TO BE SEARCHED

4. This affidavit is submitted in support of an application for the authorization to search a 2010 Toyota Corolla automobile with Washington, D.C. registration DS3247 and VIN 2T1BU4EE3AC531273 (hereinafter "target vehicle #1"). Target vehicle #1 is registered to Nowana Oncelia Borges, at 2715 Terrace Road, S.E., Apartment 290, Washington, D.C. 20020, but was used by JOSPEH JOHN BORGES. The target vehicle was seized by the FBI/MPD Safe Streets Cross Border Task Force officers on March 26, 2014 and is currently located at the FBI's facility at Cheverly, Maryland.

BACKGROUND

5. On April 3, 2014, I obtained a search warrant for this target vehicle from Magistrate Judge Deborah A. Robinson in the District Court for the District of Columbia, in 14-MJ-306. At the same time, I also obtained two search warrants for two other vehicles -- a 2012 Chrysler 300 automobile with Maryland registration 3BD9518 and VIN 2C3CCACGXCH192518 (hereinafter target vehicle #2), registered to and used by CHARLES EDWARD GREER, Sr. at 1100 Owens Road, Apartment 304, Oxon Hill, Maryland, 20745 and a 2013 Kia Optima (hereinafter "target vehicle #3") with Washington, D.C. registration EJ-4520

5XXGN4A74DG187119, registered to and used by Darnell K. JACKSON, with a listed address of 220 Adams Street., N.E., Washington, D.C. At the time, I believed that all three vehicles had been transported to the parking garage for the FBI's Washington Field Office at 601 4th Street, NW, Washington, D.C.

6. On April 7, 2014, during the time that I executed the search warrants for the target vehicles #2 and #3[1] (which were located at the FBI's Washington Field Office), I discovered that target vehicle #1 remained at the FBI's off-site secure location, in Cheverly, Maryland. I therefore returned the D.C. search warrant issued in 14-MJ-306 (DAR) as "unexecuted." I now seek a search warrant for target vehicle #1 from the District of Maryland.

7. I advise the Court of the following additional facts: on April 22, 2014, I met with the wife of Joseph BORGES who had requested that some personal items taken in a search warrant at her home be returned to her. She also requested the tags for target vehicle #1. As I went to remove the tags from target vehicle #1, I noticed that there appeared to be a hard plastic liner which covered the inside top of the wheel well for the driver's side rear tire. I then observed that there did not appear to be a corresponding hard plastic liner covering the inside top of the wheel well on the opposite side of the vehicle. I know that wheel wells typically do not have hard plastic liners covering the inside top area. I also know that drug dealers often have sophisticated trap or hidden compartments installed into vehicles for the purpose of concealing narcotics and currency from law enforcement in the event they are stopped by law enforcement and their vehicles searched. Thereafter, on April 23, 2014, I obtained the assistance of PGPD canine Officer Michael Amarino. His canine walked around the perimeter of the target vehicle

---

[1] Items with evidentiary value were located and seized from these two vehicles. Among other items, there were 9 zip locks of suspected heroin located in Jackson's Kia Optima and a telephone (most likely used by Greer which was the subject of the wiretaps) was found in Greer's Chrysler 300.

and poked its head all the way up into the driver's side rear wheel well. The PGPD officer then advised me that his dog had alerted to the presence of narcotics or narcotic residue. The PGPD officer further opined that the hard plastic liner in the wheel well looked different from the other side.

THE INVESTIGATION

8. I am currently participating in an investigation which targets heroin traffickers operating in the District of Columbia and Maryland. The investigation began in March 2013 and is being investigated in conjunction with Task Force Members. The three main targets of this investigation are Joseph BORGES, who resided at 907 Horse Collar Road, Accokeek, MD; Charles GREER, who resided at 1100 Owens Road, Apt. #304, Oxon Hill, Maryland; and Darnell JACKSON, who resided at 220 Adams Street, N.E., Washington, D.C. All three men have since been arrested and indicted as described herein. Each of their vehicles, including target vehicle #1, was seized on the respective day of their arrests.

9. In March 2013, the FBI and MPD began an investigation into a person known to law enforcement as DARNELL JACKSON who was reportedly distributing heroin in five separate neighborhoods in Southeast and Northwest, Washington, D.C. Wiretap interceptions on JACKSON's phone led to the identity of CHARLES GREER as JACKSON's heroin supplier. Further wiretap interceptions on GREER's phone led to the identity of JOSEPH BORGES as GREER's heroin supplier. Other people have been identified as GREER's heroin customers. This investigation thus far has utilized wire interceptions on the JACKSON target cellular telephone and the GREER target cellular telephone and the GREER target home telephone, interceptions of oral communications occurring in and within the vicinity of GREER's vehicle, a confidential informant (CW-1), an undercover police officer (UCO-1), controlled narcotic purchases, GPS

data from both the GREER target cellular telephone and the JACKSON target telephone, and various means of surveillance, including the use of pole cameras and other investigative techniques. Thus, through the investigation, law enforcement officers were able to identify a large scale heroin distribution operation (including the street level distribution of heroin by JACKSON) which was managed and operated by GREER, who in turn was supplied by BORGES, which was operating both in the District of Columbia and the District of Maryland.

10. At the beginning of this investigation, between April and September 25, 2013, law enforcement made a series of controlled purchases of about ten to forty grams of suspected heroin from JACKSON, using an undercover officer on several dates, including: April 11, 10 grams for $1000; May 1, 10 grams for $1000; May 10, 12 grams for $1200; June 27, 20 grams for $2000; August 20, 20 grams for $2000; September 9, 20 grams for $2000 and September 25, 40 grams for $3800. On many of these occasions, law enforcement observed JACKSON arrive in his Kia Optima (target vehicle #3) to deliver the suspected heroin to the undercover officer.

11. Thereafter, authorization to intercept wire communications on various telephones was given by the Honorable Rudolph Contreras, of the District Court for the District of Columbia, regarding among other things the telephone numbers 240-355-6059 (the GREER target cellular telephone) and 240-455-6173 (the GREER target home telephone) and authorization to intercept oral communications in and within the vicinity of target vehicle #2 (GREER's car) was given by the Honorable Roger Titus, of the District of Maryland; in 14-MC-63.

12. The following are examples of interceptions from the JACKSON and the GREER cellular telephones and from the GREER vehicle and instances of surveillance which support my

belief that JACKSON, GREER and BORGES worked together to acquire large amounts of heroin for re-distribution in the Washington, D.C. area.

13. In activation #328, on September 18, 2013, at 5:19 p.m., JACKSON called GREER on the GREER target cellular telephone. JACKSON told GREER, "I need that same order as soon as possible." GREER told JACKSON he could do it but would need an hour and a half. In activation #336, on September 18, 2013, at 6:33 p.m., GREER called JACKSON. GREER asked where JACKSON was located. JACKSON told GREER that he was "on Ridge Place in the back of Good Hope Road." GREER told JACKSON, "I'll meet you at Safeway." At approximately 6:50 p.m., agents conducting surveillance observed a man, driving a silver Chrysler 300 bearing Maryland license tag 3BD9518, as he left the parking lot of the Safeway grocery store located at 2845 Alabama Avenue, S.E., Washington, D.C., near the intersection with Good Hope Road. The silver Chrysler 300 is registered to Charles Edward Greer, Sr., 1100 Owens Road, apartment 304, Oxon Hill, Maryland and the driver of the Chrysler 300 was identified as GREER. In activation #342, at 6:53 p.m., GREER called JACKSON and told him, "That's 20." JACKSON responded, "Oh that's 20?" GREER said, "Yeah, that's what you said. Don't worry I will get back with you. Whenever you get it call me." Based on my training and experience, I believe that when JACKSON asked for the "same order" in activation #328, JACKSON was asking for twenty grams of heroin. In activation #342, when GREER told JACKSON, "That's 20," he was telling JACKSON he had provided twenty grams of heroin. I believe that JACKSON had intended to order a lesser amount and did not pay GREER for the whole 20 grams.

14. In activation #1371, on September 24, 2013, at 11:32 a.m., UCO-1 called JACKSON from telephone number 202-288-7762. UCO-1 said, "Hey look I'm trying to get the

same thing for me but I got my girl onboard, she trying to get something too." JACKSON asked, "What she want, the same thing?" UCO-1 responded, "Yeah, the same thing." JACKSON said, "That will be like forty." UCO-1 then said, "Remember that price we quote? Is she still good for that?" JACKSON said, "You said eighteen right?" UCO-1 said, "Yeah for her." JACKSON said, "Eighteen and twenty so that would be thirty-eight." UCO-1 said, "Yep." From the investigation, I know that during the controlled purchase on August 7, 2013, UCO-1 broached the topic of whether he could bring his own partner so they could jointly obtain upwards of forty grams of heroin from JACKSON, and JACKSON indicated that he would be able to supply this greater amount with ease. UCO-1 asked JACKSON if he could get the second 20 gram amount at a discount and they agreed on $1,800 rather than the $2,000 which UCO-1 had been paying for twenty grams.

15. On September 25, 2013, at 12:35 p.m., UCO-1 drove to the CVS Pharmacy located at 845 Bladensburg Road, N.E., Washington, D.C. JACKSON arrived in his 2013 Kia Optima bearing D.C. tag EJ-4520 with two other men. JACKSON exited his vehicle and got into the passenger side of UCO-1's vehicle. JACKSON gave UCO-1 a plastic bag containing forty grams of suspected heroin. UCO-1 gave JACKSON $3,800. JACKSON exited UCO-1's vehicle, got back into his car and exited the parking lot.

16. In activation #2162, on September 29, 2013, at 1:42 p.m., GREER called JACKSON from the GREER target telephone. JACKSON told GREER, "I know you want your money." GREER said "Oh, you got something?" GREER then told JACKSON, "I was going to the Kentucky Fried, you ain't want no chicken did you?" JACKSON told GREER, "I want a ten piece." GREER told JACKSON that he would be coming out in around 25 minutes. JACKSON told GREER, "Look I got to make a run right quick, then I'll get right back with you." Your

affiant believes JACKSON was ordering ten grams of heroin from GREER. When JACKSON told GREER he had to "make a run" he was telling him he needed to collect some money before they met later.

17. In activation #2803, on October 3, 2013, at 9:01 a.m., GREER called JACKSON from the GREER target telephone. JACKSON told GREER, "I need a ten piece." Following this call, in activation #2810, at 10:20 a.m., GREER told JACKSON that he would be on the lot at 10:30. I believe that in this series of calls, JACKSON requested ten grams of heroin and made arrangements to meet at a car wash. Following these calls, agents conducting surveillance were able to determine the location of the meeting spot and observed GREER at the lot, although JACKSON had already departed.

18. In activation #1143, on November 1, 2013, at 4:53 p.m., GREER called someone and told him to call "Fat Daddy" and tell "Fat Daddy" to give GREER a call. Following this call, in activation #1145, at 5:08 p.m., DARNELL JACKSON called GREER from the Jackson target cellular telephone. GREER referred to JACKSON as "Fat Daddy" and told JACKSON that everything is "lovely." GREER then said that he could not get with JACKSON until the following morning. JACKSON said that was fine. GREER then said, "I'm going by the Safeway to get some chicken for your party, how many pieces you want?" JACKSON said he wanted "a 20 piece," and GREER said he would "have it in the morning." JACKSON asked if GREER would "throw some extra in," even though he only had the money for a 20 piece, and GREER said that he would. Based on my training and experience, I believe JACKSON was ordering 20 grams of heroin from GREER.

19. In activation #1214, on November 2, 2013, at 12:25 p.m., BORGES called GREER. GREER asked BORGES what was going on. BORGES responded that he did not

know. BORGES then said, "I'm trying to see if that bitch still loves me, if she's still in love." GREER replied, "I'm trying to find out now. It should be all right, I ain't paid that shit no mind." BORGES then said, "Yeah, the nigga put me on to a girl, he said she just like his old girl, so I just wanted to make sure." GREER asked, "What did the youngin say?" BORGES replied, "He said the same thing…I like to hear from everybody." Based on the investigation, I believe BORGES was calling GREER to ask about the quality of the heroin he supplied to GREER the previous day because BORGES had received this quantity from a different supplier.

20. In activation #1605, on November 6, 2013, at 10:20 a.m., GREER called BORGES at telephone number 202-740-3343. BORGES answered, "Lemon." GREER then said "I'm gonna call you from the other phone." I believe the "other phone" to which GREER referred was the GREER target home telephone. Based on this call, agents quickly rushed to the location where they previously observed GREER on November 1, 2013 following his meeting with BORGES. GREER was observed in the Wendy's Restaurant parking lot, which is located at 3636 Branch Avenue, Suitland, Maryland. GREER was parked next to a black Toyota Corolla bearing Washington D.C. tag DS 3247, VIN 2T1BU4EE3AC531273, registered to Nowana Ocelia Borges, 2715 Terrace Road, S.E., Apt. 290, Washington, D.C. BORGES was sitting in the passenger side of GREER's vehicle. BORGES exited GREER's vehicle then and walked to the rear of Toyota Corolla and opened the trunk. BORGES retrieved an empty white plastic bag from the trunk and returned to GREER's vehicle.

21. A few minutes later, BORGES exited GREER's vehicle with the white plastic bag, which now contained an unknown item. BORGES placed the item into the front passenger side of the Toyota Corolla then got into the driver's side and exited the parking lot. Following

this, GREER also exited the parking lot.[2] I believe (based on other calls not listed herein) that GREER returned poor quality heroin to BORGES, which GREER received from an unsatisfied customer the previous day.

22. In activation #1735, on November 7, 2013, at 12:54 p.m., BORGES called GREER from telephone number 202-740-3343. The two men agreed to meet at the "lot" in 45 minutes. Agents conducted surveillance using the pole camera and observed the following: BORGES arrived in the same Toyota Corolla, parked on Southern Avenue and walked over to where GREER's vehicle was parked on the lot. BORGES got into GREER's vehicle and the two men appeared to talk for about twenty minutes. Thereafter, BORGES exited GREER's car, empty handed, and drove away.

23. In activation #4856, on December 16, 2013, at 7:16 p.m., GREER called BORGES. GREER asked, "You ain't at the hamburger place, is you?" BORGES said, "No, I'm by the lot." GREER said, "Ok, I'm sitting right here." Agents conducted surveillance using the pole camera focusing on the car lot and observed the following: at approximately 7:05 p.m., GREER arrived at the lot. BORGES arrived fifteen minutes later and parked his Toyota Corolla, (target vehicle #1) on Southern Avenue. BORGES walked to GREER's vehicle and got into the front passenger seat. Approximately ten minutes later, BORGES exited GREER's vehicle, returned to his vehicle and drove off. I believe that at this meeting, BORGES provided GREER with heroin.

24. In activation #4859, on December 16, 2013, at 7:28 p.m., GREER called COREY RICH at telephone number 301-806-5246. (Rich is another of Greer's heroin customers).

---

[2] BORGES was identified later this day in the following manner: agents researched the known relatives of the woman to whom the car was registered and learned the name "Joseph BORGES." Agents then viewed a government issued photograph of BORGES and recognized him as the person meeting with GREER earlier that day.

GREER sat in his vehicle with BORGES at the time he placed the call to this customer. As this telephone call to RICH was heard to begin ringing, a background conversation was captured. GREER was overheard to say to BORGES, "I remember when I first got some you was telling me about the smell." Based on my training and experience, I know that when heroin is more undiluted it has a strong vinegar smell. RICH then answered the phone and GREER asked where he was. He responded, "Where do you want me to be?" GREER told him, "Come to the lot." He told GREER he would be there in ten minutes. Agents who were conducting surveillance using the pole camera then observed the following: shortly after BORGES departed GREER's vehicle, at approximately 7:35 p.m., a black GMC Yukon arrived at the car lot and the driver got into GREER's vehicle. Approximately ten minutes later, the driver exited GREER's vehicle and returned to the GMC Yukon. The GMC Yukon and GREER then drove off. (The driver could not be seen clearly but COREY RICH is believed to have been the person in the GMC Yukon.) I believe that GREER received heroin from BORGES and was able to pass it off to the customer in the privacy of his vehicle.

25. In activation #4918, on December 17, 2013, at 10:27 a.m., RICH called GREER from telephone number 301-806-5246. RICH explained, "I need like two more but it's cool, I don't know. I have to wait for the other dude to see what's up. But yeah, everybody from last night said the other guy was straight power, way better than that one." I believe RICH was telling GREER that RICH's heroin customers or testers were satisfied with the heroin GREER had previously provided to RICH.

26. In activation #4939, on December 17, 2013, at 1:29 p.m., GREER received an incoming call from BORGES. GREER told BORGES, "You know, they say the other one was the best. . . but I will know more in a little bit." I believe GREER was telling BORGES that

RICH's customers or heroin testers were satisfied with the potency of the heroin GREER received from BORGES and which GREER had previously provided to RICH.

27. In activation #4970, on December 17, 2013, at 5:00 p.m., JACKSON called GREER from the Jackson target telephone and said "My man says it's real strong. . . I am going to back up and get about five more motherfuckers you know and I'll call you back." In activation #4976 at 5:51 p.m., GREER called JACKSON. JACKSON said, "They ain't give no reading yet, it's still draining real good." GREER replied, "So we ain't got no problems, so I can go ahead." JACKSON replied, "Yeah." Your affiant believes JACKSON told GREER that JACKSON's heroin customers or testers were satisfied with the heroin GREER provided to JACKSON and GREER told JACKSON that as a result, GREER was going to obtain a large amount from his supplier.

28. In activation #4978, on December 17, 2013, at 5:53 p.m., GREER called BORGES. GREER told BORGES, "I am hearing all good news." Your affiant believes GREER told BORGES that the heroin BORGES had supplied to GREER was a good quality and GREER's customers were satisfied.

29. In activation #5853, on January 29, 2014, at 8:54 a.m., BORGES called GREER from telephone number 202-617-5006.[3] GREER asked, "What, you took a day off yesterday from answering your phone huh?" BORGES said, "I ain't know you called." GREER said, "About 30 times, I ain't got this number right here, I still got the other number." BORGES said, "Yeah that's why I ain't know." GREER said, "But you been responding to the other number when I call you." BORGES responded, "I ain't an ambulance, I can't respond to every 911 call. . . I'm like Lord's of London insurance, you got to have money to get me to respond." GREER

[3] This was the sixth number that BORGES used since November 1, 2013. The wire administrator recognized BORGES' voice.

then asked, "What time you coming out?" BORGES responded, "Whenever, I got some…uh…I read this article in the newspaper and I want you to read this. They was talking about the story you was telling me about the other day. Brought tears to my eyes." GREER and BORGES then agreed to meet at 10:30 a.m. I believe that in this call, GREER called his supplier who joked that he only responds when his customers have money. When BORGES talked about wanting GREER to see the "article in the newspaper," he was referring to a new batch of heroin. At 10:43 a.m., agents who were conducting physical surveillance in person observed BORGES arrive in the target vehicle #1, at the Wendy's Restaurant on 3636 Branch Avenue, Temple Hills, Maryland, where GREER was already located. BORGES got into GREER's vehicle and departed approximately fifteen minutes later.

30. In activation #6666, on February 5, 2014, at 12:09 p.m., GREER called BORGES. BORGES said, "It's gonna be like one. You gonna have to give me a second to stop past the grocery store." I believe that GREER wanted BORGES to bring him a supply of heroin, and that BORGES agreed, but had to stop and pick it up. Later that day, in activation #6681, at 2:10 p.m., GREER received a call from BORGES. BORGES asked where GREER was located and GREER replied he was "sitting up at the lot." BORGES said, "Alright, I will be right there, in about five minutes." At 2:15 p.m., surveillance conducted using the pole camera showed that BORGES arrived at the lot driving target vehicle #1. BORGES exited target vehicle #1 and walked to where GREER was parked and entered the front passenger side of GREER's vehicle. BORGES appeared to be empty handed when he entered GREER's vehicle. BORGES exited GREER's vehicle at 2:21 p.m. BORGES could clearly been seen carrying a white package about one foot by one foot when he exited GREER's vehicle. BORGES returned to target vehicle #1

and both men drove away from the car lot. Based on the investigation, I believe that BORGES was carrying money which he received from GREER as payment for heroin.

31. During the end of the month of February and into March, wire interceptions revealed that due to the inclement weather, BORGES did not receive the shipments of heroin he was expecting. However, once the weather improved, BORGES resumed supplying GREER with heroin.

32. In activation #10588, on March 21, 2014, at 2:29 p.m., BORGES called GREER from telephone number 571-328-0785. BORGES told GREER, probably "tomorrow or Sunday for sure," but that he did not know what time, or whether it would be late the next day GREER said he did not care what time it happened. Based on the investigation, I believe that BORGES told GREER he was about to be resupplied with heroin.

33. In activation #11022, on March 25, 2014, at 12:11 p.m., BORGES called GREER from telephone number 571-328-0785, and said that because GREER was home, they should go get "a bite to eat real quick." GREER asked where, and BORGES said, "the hamburger joint." They agreed to meet in 15 to 20 minutes. Based on the investigation, I believe that in this call, BORGES and GREER made arrangements to meet so that GREER could be resupplied with heroin.

34. From the interception device placed in GREER's vehicle, in Session #364, on March 25, 2014 at 12:33 p.m., BORGES said, "200." GREER asked if that was it. BORGES said that wasn't it. GREER asked if that was all BORGES had for him. BORGES said that it was all for right now. GREER said the stuff would be gone in 20 minutes. GREER then said that it would not satisfy his people, and that he had seven or eight people now. In this conversation, agents believe BORGES supplied GREER with 200 grams of heroin.

35. From the interception device placed in GREER's vehicle, in Session #375, on March 26, 2014 at 10:37 p.m., GREER said, "I had my [N-word] that called me this morning, about an hour ago, all cash man. All cash, he wants 100. That's my 100 man." BORGES replied, "It's gonna be as soon as I leave out of here. I ain't even gonna take a shower. I'm gonna catch up with you." Law enforcement officers knew BORGES had been at his regular gym, "No Excuses," in Prince George's County, Maryland. Law enforcement quickly responded to the No Excuses gym and then followed BORGES in target vehicle #1, his Toyota Corolla, from the gym to 4105 Southern Ave., Capitol Heights, Maryland. BORGES was then followed towards the car lot on Bowen and Southern Avenue in Washington, D.C. then to the Wendy's Restaurant at Branch Avenue and Old Silver Hill Rd. in Maryland.

36. Then, at 1:58 p.m., in the parking lot of the Wendy's Restaurant near Branch Avenue and Old Silver Hill Road, in Prince George's County, law enforcement watched GREER and BORGES meet inside GREER's vehicle, a 300 Chrysler, and learned from the interception device placed in GREER's vehicle oral bug that Borges provided Greer with about 300 grams of heroin. From Session #376, on March 26, 2014 at 1:57 p.m., GREER said, "How many is this?" and BORGES replied "300." GREER replied, "Okay, it is going to be gone today." As a result, law enforcement (using Prince George's County police officers) attempted to execute a traffic stop, but GREER rammed his car into the PGPD cruiser and drove off with police in hot pursuit, along Branch Avenue heading towards Washington, D.C. In Activation #11153 at 2:00 p.m., BORGES called GREER and GREER yelled, "They on my ass man. They are on my motherfucking ass. I am running. I am running man."

37. Although GREER initially fled from PGPD officers, GREER was eventually stopped and arrested within a few miles. On the median strip on Branch Avenue, along

GREER's path of flight, FBI agents found and recovered a plastic bag containing about 300 grams of heroin (which GREER had discarded from the driver's side window).

38. Meanwhile, around 3:45 p.m., BORGES was arrested as he was in the process of arriving at his home, driving target vehicle #1, in Accokeek, Maryland. Thereafter, a search warrant authorized by Magistrate Judge Schulze on March 25, 2014 (Misc. No. 14-721 JKS) was executed at BORGES's residence on Horse Collar Rd. in Accokeek, Maryland. Law enforcement seized cash from BORGES's master bedroom closet money in the amount of approximately $780,000 (a pack back with $649,8000 and a shoe box with $130,800) and also $5,978 from his back pack which he had carried with him. Also found in the home were two loaded firearms, a Smith & Wesson .357 Magnum revolver and a .40 Glock (with an additional extended clip), a money counter, two Rolex watches and one Audemars Piguet watch and other expensive jewelry, among other items. Also seized were BORGES's and his wife's U.S. Passports -- they reveal BORGES and his wife traveled to Tahiti (July 2013) and St. Barthelemy (French West Indies, July 2012). BORGES's passport shows additional international trips in 2011 when he went through passport control in Amsterdam and Paris. A cursory check was done of BORGES' target vehicle #1 after his arrest, but nothing of significance was located. (His key chain, which included the key to the vehicle and the backpack with $5,978 and his telephone had been removed from the car at the time of his arrest).

39. On March 27, 2014, at 3:45 p.m., the Honorable Magistrate Judge Jillyn Schulze of the District of Maryland authorized (telephonically) a search warrant for "South Hill Apartment Homes 4501 Southern Ave Apt 2B Capitol Heights, MD." This is the location where task force officers saw Borges go to retrieve the 300 grams of heroin which he provided to Greer on March 26, 2014. Task Force members then executed the search warrant, making entry at 4:30

p.m. After they had arrived and begun the execution of the warrant, the agents realized that the address was actually "4105 Southern Avenue." (In fact, there is no 4501 Southern Avenue). Inside Apartment 2B, law enforcement found and seized five bricks containing over one kilogram of heroin, a heroin press (which weighed 100 pounds), acetone and spray bottles used with the press, four commercial blenders, 11 bars of manitol (a cutting agent), sifters, strainers, bags, bowls and cardboard boxes used to mix heroin, scales and numerous items used to repackage heroin. Heroin powder covered these items and covered the countertops. The apartment was determined to be what is commonly called a stash apartment—that is, a location used to store and package narcotics but not easily connected to the person who is actually using the location for this illicit purpose. In fact, later investigation revealed that a woman not related to BORGES rented this apartment for his use.

40. On March 27, 2014, an indictment was returned in Washington, D.C. charging BORGES, GREER and others with participating in a heroin narcotics conspiracy, in violation of Title 21, United States Code, Section 846.

41. In sum, I believe that the facts contained herein show that BORGES operated as a large scale importer and supplier of heroin to GREER and that BORGES used target vehicle #1 to transport heroin and currency.

CONCLUSION

42. Based on the above, I submit that there is probable cause to search target vehicle #1, described herein, and to seize evidence, contraband, fruits and instrumentalities of narcotics

trafficking offenses.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Detective Joseph Sopata
MPD/FBI Safe Streets Task Force

Sworn to and subscribed before me
this 29th day of April 2014.

United States Magistrate Judge
District of Maryland